

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CHARLENE CARTER,	§	
	§	
	§	
Plaintiff,	§	Civil Action No. 03:17-cv-02278-S
v.	§	
	§	
SOUTHWEST AIRLINES CO., AND	§	
TRANSPORT WORKERS UNION	§	
OF AMERICA LOCAL 556,	§	
	§	
Defendants.	§	

**[PROPOSED] ORDER GRANTING SOUTHWEST AIRLINES CO'S EMERGENCY
MOTION AND REQUEST FOR SANCTIONS**

The Court has considered Southwest Airlines Co.'s ("Southwest") Emergency Motion and Request for Sanctions ("Motion") filed on July 8, 2020 in the above-captioned action.

Having considered all papers and evidence submitted by the parties; oral argument of counsel; and all other matters presented to and on file with the Court, the Court hereby grants Southwest's Motion and orders the following:

1. Plaintiff's counsel, Matthew Gilliam ("Gilliam"), shall provide to Southwest's counsel, Michael Correll ("Correll"), the identity of any Southwest employee(s) who have provided him, his agents, co-counsel, or any other individual(s) associated with representing Carter in this case information regarding the schedule of Southwest's flight crew, including Audrey Stone. Gilliam shall provide this information to Correll as soon as possible, but no later than three (3) calendar days from the date of this order.

2. Plaintiff, Gilliam, Gilliam's agents, Gilliam's co-counsel, and any other persons associated with Plaintiff's representation in this matter shall produce all documents received

from and communications with the individual(s) Gilliam identifies in accordance with paragraph 1 of this order. Gilliam shall provide this information to Correll as soon as possible, but no later than three (3) calendar days from the date of this order

3. Plaintiff and Gilliam shall be jointly and severably liable to Southwest for all reasonable costs and fees Southwest incurred in bringing this motion, including the costs and fees associated with the filing of any reply brief and participating in oral argument. Southwest shall file an application for attorneys' fees within twenty-one (21) days of this order.

4. Gilliam's *pro hac vice* status in this Court is hereby revoked and Gilliam may no longer represent Carter in this court.

IT IS SO ORDERED.

Date: _____
